

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

DAVID W. MAYER,

Plaintiff,

v.

GOLDEN RULE INSURANCE  
COMPANY and UNITED HEALTHCARE  
INSURANCE COMPANY,

Defendants.

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C.A. NO. 1:09-CV-1018

**AGREED MOTION FOR PROTECTIVE ORDER**

Plaintiff and Defendants file this Motion for Agreed Protective Order, and state:

I.

This dispute involves the rescission of a health insurance policy. The parties anticipate that numerous documents central to this dispute will contain personal and medical information of Plaintiff, as well as (among other things) proprietary underwriting guidelines of Defendant. Accordingly, the parties seek a protective order to protect their confidential information and to facilitate discovery in this case, as set forth in the attached Agreed Protective Order.

II.

For the foregoing reasons, the parties respectfully request the Court enter the attached proposed Agreed Protective Order.

Respectfully submitted,

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